

DOCKET FILE COPY ORIGINAL

RECEIVED

JUL 17 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Federal-State Joint Board on
Universal Service

)
)
)
)

CC Docket No. 96-45

PETITION FOR RECONSIDERATION

Joe D. Edge
Tina M. Pidgeon
DRINKER BIDDLE & REATH LLP
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005
(202) 842-8800

Dated: July 17, 1997

No. of Copies rec'd
List ABCDE

OTG

TABLE OF CONTENTS

SUMMARY	1
I. INTRODUCTION	1
II. SECTION 254(b)(3) PLAINLY REQUIRES THAT UNIVERSAL SERVICE BE MADE AVAILABLE SPECIFICALLY TO INSULAR AREAS	3
III. COSTS FOR CARRIERS SERVING INSULAR AREAS ARE NOT LIKELY TO BE APPROPRIATELY REFLECTED THROUGH A COST PROXY MODEL	6
IV. THE COMMISSION HAS ARBITRARILY GROUPED PRTC WITH CARRIERS OF INCOMPARABLE SIZE AND ECONOMIES OF SCALE . .	7
V. CONCLUSION	13

SUMMARY

Puerto Rico Telephone Company ("PRTC") urges the Commission to reconsider its Universal Service Report and Order to give effect to each word of the statute. Specifically, Sections 254(b)(3) and 254(b)(5) require that the universal service fund preserve and advance universal service support by making service affordable for insular areas, as well as high cost areas and rural areas. The Report and Order has not met this statutory requirement because it essentially reads out of the statute the guarantee of universal service for one distinct population segment — those citizens living in insular areas that are not served by rural carriers. The Commission diverged significantly from the plain language of the statute in that it has made no specific provisions for universal service distributed to insular areas.

At issue here is the ability to determine the necessary universal service support for carriers facing unique circumstances in their efforts to provide affordable service. It is improbable that the costs of serving insular areas will be estimated with any accuracy through a proxy model methodology because of the special circumstances under which carriers providing service to these areas operate. In addition, carriers like PRTC have been unable to determine whether the proxy models under consideration at all approximate the costs to serve Puerto Rico, because the data has not been available to run the models. In this instance, therefore, the Commission should recognize that

the difficulty in measuring costs for insular areas necessitates a transition to the proxy model methodology, if at all.

In denying this request by PRTC in the Report and Order, the Commission assumes that there is a specific size of company, which, regardless of service territory, achieves certain economies of scale and scope, in turn resulting in presumptively affordable rates. This assumption, however, fails particularly for a carrier serving an insular area. Therefore, PRTC urges the Commission to reconsider in part its Universal Service Order to find that carriers serving insular areas should be permitted to transition to the proxy cost model methodology.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	

PETITION FOR RECONSIDERATION

Puerto Rico Telephone Company ("PRTC") submits its Petition for Reconsideration of certain aspects of the Commission's Report and Order¹ issued in the above-referenced proceeding.²

I. INTRODUCTION

The Telecommunications Act of 1996 instituted a new paradigm for universal service. Changes to the existing universal service fund mechanism were clearly required to meet the statute's requirements that support be "specific, predictable, and sufficient."³ Throughout the course of this proceeding, PRTC has been an advocate of developing a new universal service system that ensures that universal service is affordable to all consumers in rural, insular, and high cost areas, as also

1. Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, FCC 97-157 (rel. May 8, 1997) ("Order").

2. PRTC submitted a Petition for Reconsideration of the Access Charge Reform Order (CC Docket No. 96-262) regarding the requirement that all universal service support be applied to reduce or satisfy the interstate access charge revenue requirement. To the extent that this finding was also issued in the instant universal service Order, PRTC incorporates by reference that Petition for Reconsideration in this docket as well.

3. 47 U.S.C. § 254(b)(5).

required by statute. The Order has not met this statutory requirement because it essentially reads out of the statute the guarantee of universal service for one distinct population segment — those citizens living in insular areas that are not serviced by rural carriers.

The Commission's designation between non-rural and rural carriers for the purpose of applying the chosen methodology for determining universal service distributions arbitrarily places PRTC in the same category with regional Bell Operating Companies. To the contrary, however, PRTC does not benefit from economies of scale and scope available to these companies because it experiences much greater average costs in serving an insular area, which consists largely of challenging terrain and sparsely populated areas. The challenge for PRTC to provide affordable, reliable basic service island-wide is compounded by the high incidence of poverty that is pervasive throughout the island. While some of the Lifeline reforms will benefit qualified low-income subscribers, PRTC faces a systemic poverty problem in providing service that further distinguishes it from the large carriers with which it has been arbitrarily grouped. PRTC has shown that it is unlike these large carriers, and this distinction can be implemented if universal service mechanisms currently available for rural carriers serving insular areas are extended to all carriers serving insular areas, as required by the statute.

II. SECTION 254(b)(3) PLAINLY REQUIRES THAT UNIVERSAL SERVICE BE MADE AVAILABLE SPECIFICALLY TO INSULAR AREAS

It is a basic tenet of statutory construction that Congress intends for each word in a statute to have meaning. See United States v. McGoff, 831 F.2d 1071, 1080 (D.C. Cir. 1987) (finding that a court will "assume that Congress intended that language which it chose to employ actually was to have meaning"). From this assumption it follows that "effect must be given, if possible, to every word, clause and sentence of a statute . . . so that no part will be inoperative or superfluous, void or insignificant." National Assoc. of Recycling Indus., Inc. v. I.C.C., 660 F.2d 795, 799 (D.C. Cir. 1981) (citations omitted). Therefore, when promulgating regulations to implement the statutory language, an agency should "giv[e] effect to each word and mak[e] every effort not to interpret a provision in a manner that renders other provisions of the same statute inconsistent, meaningless or superfluous." Implementation of the Telecommunications Act of 1996; Telemessaging, Electronic Publishing, and Alarm Monitoring Services, Second Report and Order, 12 FCC Rcd 3824, 3830 n.31 (citing Lake Cumberland Trust, Inc. v. E.P.A., 954 F.2d 1218, 1222 (6th Cir. 1992)).

In the case of universal service, the statute specifically requires that:

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably

comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.⁴

However, the Commission diverged significantly from the plain language of the statute in that it has made no specific provisions for universal service distributed to insular areas. Instead, the Commission has chosen to limit its obligation to ensure universal service support to rural and high cost areas⁵ and low-income consumers and has effectively read Congress' direction regarding insular areas out of the Act. This interpretation of the statutory mandate is contrary to the plain meaning of the statute and basic tenets of statutory construction.

Congress appropriately recognized insular areas have unique universal service needs. According to this principle, the Joint Board and the Commission were to create a universal service system such that consumers in insular areas, and in rural areas, and in high cost areas receive affordable service at rates comparable to consumers in urban areas. The Commission, however, has been guided by this principle to the extent that a carrier serves a high cost area or by virtue of its status as a rural

4. 47 U.S.C. § 254(b)(3) (emphasis added).

5. The Commission has not yet chosen a proxy model for determining universal service support for high cost areas. Therefore, PRTC cannot determine whether the obligation to ensure affordable rates for high cost areas has been met. In addition, the proxy models currently under consideration have not been populated with data for Puerto Rico. At this time, therefore, PRTC has no knowledge of the impact of its receiving universal services support based solely on a proxy model methodology.

carrier pursuant to Section 3(37) of the Communications Act. In this regard, insular areas that are not served by rural carriers would receive universal service support based on a mechanism that may be suitable for the mainland, but not for insular areas.

Just as the Commission has concluded that Congress' language regarding services to rural areas should be implemented with specificity, the language regarding insular areas should be implemented as well. PRTC agrees with the Commission's finding that there are subsets of carriers — i.e., rural carriers — serving high cost areas that should not immediately be subject to the proxy model methodology. However, PRTC disagrees with the Commission's failure to recognize that carriers serving insular areas should receive similar consideration based on the clear language of the statute. Virtually no provision has been made for insular areas, unless consumers in those areas happen to be served by rural carriers. This outcome is contrary to the plain language of the statute and should be reconsidered by the Commission.⁶

6. The primary states, possessions, or territories that qualify as insular areas are Puerto Rico, Hawaii, the U.S. Virgin Islands, Guam, the Northern Marianas Islands, and American Samoa. The limitation that only rural carriers serving insular areas may transition to the proxy model methodology denies "insular area" treatment to approximately 4,992,000 consumers in insular areas, which represents 93 percent of this population. See Statistical Abstract of the United States, Bureau of the Census (1996) at 810 (Table No. 1309, 1996 projection); Population Estimates Program, Population Division, U.S. Bureau of the Census, Estimates of the Population of States (released December 30, 1996). If Congress intended for only seven percent of consumers in insular areas to benefit from the insular area designation, then the "insular" designation would have been more narrowly tailored. The
(continued...)

III. COSTS FOR CARRIERS SERVING INSULAR AREAS ARE NOT LIKELY TO BE APPROPRIATELY REFLECTED THROUGH A COST PROXY MODEL

At issue here is the ability to determine the necessary universal service support for carriers facing unique circumstances in their efforts to provide affordable service. Theoretically, when support is appropriately calculated, the carrier will be better able to implement the universal service mandate. In some cases, however, the appropriate calculation may be beyond the capabilities of a proxy model. In this regard, the Joint Board and the Commission already have recognized that the costs of rural carriers may not be best reflected by the initial proxy model versions. The same is true for carriers serving insular areas, not only rural carriers serving these areas.

In the Recommended Decision, the Joint Board recognized a distinction between rural carriers in general and rural carriers serving insular areas, focusing particularly on the difficulty of accurately estimating carrier costs in insular areas. The Joint Board found that "while we believe that proxy models may provide an appropriate determination of costs on which to base high cost support, we are less certain that they may do so for rural carriers in Alaska and insular areas."⁷

The Commission similarly recognized a distinction between serving insular areas as compared to other areas and determining

6. (...continued)

Commission, therefore, should give full effect to the "insular" designation as written in Section 254(b)(3).

7. Federal-State Joint Board on Universal Service, Recommended Decision, 12 FCC Rcd 87, 240 (¶ 298) (1996).

the appropriate support mechanism. In distinguishing between the forward-looking cost proxy model to be adopted for non-rural and rural carriers, the Commission determined that a further Notice of Proposed Rulemaking should be issued to begin determining the mechanisms for adopting a forward-looking proxy model for rural carriers. In doing so, the Commission recognized that "the unique situation" faced by carriers serving insular areas would make the cost selection of inputs for these carriers "especially challenging."⁸

This distinction between carriers serving insular areas and high cost areas generally is a proper one under the statute and should not be narrowed by limiting particular treatment of insular areas to those served by rural carriers. Rural areas receive a separate designation under Section 254(b)(3), distinct from high cost areas and insular areas. In this instance, the distinction can be best effectuated by recognizing that the difficulty in measuring costs for insular areas necessitates a larger transition to the proxy model methodology, if at all.

IV. THE COMMISSION HAS ARBITRARILY GROUPED PRTC WITH CARRIERS OF INCOMPARABLE SIZE AND ECONOMIES OF SCALE

The Commission has denied PRTC's request that a carrier serving an insular area should not be grouped generally with the largest mainland carriers for the purpose of applying the universal support distribution mechanism. The Commission's

8. Order at ¶ 255.

decision appears to rely entirely on its decision to group PRTC with carriers of incomparable size that serve disparate territories. In this regard, the Commission claims that:

large telephone companies such as [PRTC] should possess economies of scale and scope to deal efficiently with the cost of providing service in their areas, and thus, the level of that support will be determined through a forward-looking mechanism.⁹

This analysis, therefore, assumes that there is a specific size of company, which, regardless of service territory, achieves certain economies of scale and scope, in turn resulting in presumptively affordable rates. The assumption, that PRTC must sufficiently benefit from economies of scale and scope, fails particularly for a carrier serving an insular area. The assumption has two basic flaws: first, it does not account for the fact that the service penetration rate in Puerto Rico remains below 75 percent, and second, it assumes that a company the size of PRTC is on par with a BOC or GTE.

A. Insular Areas Experience Chronically Low Penetration Rates Which Mitigates Against Possible Benefits of Economies of Scale or Scope

As the Commission stated, "insular areas generally have subscribership levels that are lower than the national average, largely as a result of income disparity, compounded by the unique challenges these areas face by virtue of their locations."¹⁰ According to the Commission, this finding is not relevant to

9. Id. at ¶ 315.

10. Id. at ¶ 112.

ensuring affordable service in Puerto Rico, because the Commission has asserted without any basis that PRTC and its prescribers can financially withstand a sudden change or loss in universal service support. This conclusion is contrary to the record in this proceeding.

Theoretically, many carriers have available the option to raise rates as justified by costs in response to a change in universal service funding. In Puerto Rico, however, such a rate increase undoubtedly would result in a substantial loss of subscribers. Resorting to a rate increase to survive a potential change in universal service support directly conflicts with the statutory goal of universal service to ensure affordable basic service.¹¹ A substantial rate increase should not be the anticipated result of implementing such a program, but this is essentially what the Commission asks of PRTC.

If insular areas do not receive universal service support near current levels, the low penetration rate that already characterizes these areas will decrease further. In Puerto Rico, for example, over forty-five percent of the families generate incomes below the poverty level.¹² Clearly, a rate increase resulting from a decrease or elimination of universal service support for PRTC would result in lost subscribership. For Puerto Rico, the loss in universal service support (including Long-Term

11. See 47 U.S.C. § 254(i).

12. See PRTC Ex Parte Presentation, CC Docket No. 96-45 (filed April 4, 1997).

Support) could exceed \$80 million. It is not improbable that the loss of these funds could result in a 50% rate increase. For the average Puerto Rico family, the net effect could be a monthly phone rate as high as \$42.50 in mainland dollars.¹³ The unavoidable decrease in subscribership that would directly result from a loss in universal service support would constitute a failure to meet the mandated goal of universal service.

B. PRTC Does Not Have Economies of Scale or Scope Similar to the BOCs

The Commission has grouped PRTC with the BOCs and GTE in terms of its expected ability "to deal efficiently with the cost of providing service" in Puerto Rico. But a comparison of these carriers demonstrates that PRTC is more appropriately grouped with mid-sized carriers that do not have the same economies of scale and scope.

For example, BellSouth, the largest BOC, has twenty times the access lines of PRTC and thirteen times the operating revenues.¹⁴ U S West, the "smallest" of the BOCs, still has fourteen times the access lines of PRTC and nine times the

13. PRTC's weighted average rate for basic, unlimited local service is \$14.50. See PRTC Reply Comments, CC Docket No. 96-45 (filed May 7, 1996) at 9. The national median income is two times higher than the median income in Puerto Rico. Therefore, a rate increase in Puerto Rico has a real impact twice that of the same, increase if instituted on the mainland. See PRTC Ex Parte Presentation, CC Docket No. 96-45 (filed April 4, 1997).

14. "Phone Facts," United States Telephone Association (1996) at 8.

operating revenues.¹⁵ It certainly may be sensible to rely on the economies of scale and scope of these carriers to deal efficiently with the cost of providing service when USF support is in a state of flux. However, PRTC, a government-owned phone company, simply is not in the same league as these large companies.

The assessment that really matters here is actual costs. Using average loop costs as a point of comparison, PRTC's annual average loop cost is \$364.55.¹⁶ The annual average loop cost for Ameritech in Indiana is \$202.10,¹⁷ and for Bell Atlantic in Maryland it is \$213.39.¹⁸ Comparing this loop cost data, PRTC's costs are 80.4 percent higher than Ameritech's and 70.8 percent higher than Bell Atlantic's. This measurement alone indicates that PRTC operates on a substantially higher cost curve than these companies, so that in actual dollars, the real question is whether PRTC's actual costs can render affordable rates for consumers.

In addition, the low penetration rate in Puerto Rico translates into lost economies of scale. A low penetration rate necessarily entails a higher incidence of passed homes — i.e., potential subscribers that do not take service even though there

15. Id.

16. 1977 Monitoring Report, CC Docket No. 87-339 (May 1997) at Table 3.7.

17. Id. at Table 3.9 (p.5).

18. Id. at Table 3.9 (p.9).

is a loop right up to their doorsteps. In this circumstance, the per loop cost increases dramatically because distribution facilities are under-utilized. As the Joint Board pointed out with respect to rural carriers, they "generally serve fewer subscribers relative to the large incumbent LECs, serve more sparsely populated areas, and do not generally benefit from economies of scale and scope as much as non-rural carriers."¹⁹ For these reasons, "they often cannot respond to changing operating circumstances as quickly as large carriers."²⁰ As PRTC has described above, these assessments apply equally to any carrier serving an insular area.

Finally, a carrier serving an insular area rarely if ever serves a broad enough territory such that high cost areas may be balanced against relatively low-cost, high-density areas. The carriers with which PRTC has been grouped in this proceeding each serve multi-state territories, resulting in varying cost levels. PRTC serves primarily one high density area — San Juan — and otherwise faces the challenge of providing quality service through a chain of mountains that crosses the island. Serving only the island of Puerto Rico, PRTC gains little benefit from averaging its costs across its local calling areas. Therefore, a comparison of PRTC with truly large companies shows that it does

19. Joint-Board Recommended Decision, 12 FCC Rcd at 235 (¶ 283).

20. Id.

not benefit from the economies of scale and scope presumed by the Commission.

V. CONCLUSION

The Commission should reconsider its Universal Service Order to give effect to each word of the statute. Specifically, Section 254(b)(3) requires that the universal service fund satisfy the principle that service be affordable for insular areas, as well as high cost areas and rural areas. The Commission has recognized this obligation with respect to rural carriers serving insular areas, permitting a transition to the proxy model and finding that flexible inputs may be necessary once the proxy model methodology is employed after the transition.

No supportable basis has been given, however, for these provisions to be limited to rural carriers serving insular areas. The only justification offered thus far has been that carriers of a certain size should be able "to deal efficiently with the cost of providing service in their areas." However, this assessment overlooks the fact, recognized by Congress, that providing service to insular areas is distinct from providing service to urban areas. Insular areas experience low penetration rates, and the terrain and island climate significantly increase costs. Any economies of scope and scale that are available to a mid-size carrier like PRTC are necessarily diminished when facing these

not benefit from the economies of scale and scope presumed by the Commission.

V. CONCLUSION

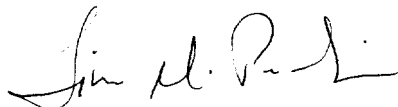
The Commission should reconsider its Universal Service Order to give effect to each word of the statute. Specifically, Section 254(b)(3) requires that the universal service fund satisfy the principle that service be affordable for insular areas, as well as high cost areas and rural areas. The Commission has recognized this obligation with respect to rural carriers serving insular areas, permitting a transition to the proxy model and finding that flexible inputs may be necessary once the proxy model methodology is employed after the transition.

No supportable basis has been given, however, for these provisions to be limited to rural carriers serving insular areas. The only justification offered thus far has been that carriers of a certain size should be able "to deal efficiently with the cost of providing service in their areas." However, this assessment overlooks the fact, recognized by Congress, that providing service to insular areas is distinct from providing service to urban areas. Insular areas experience low penetration rates, and the terrain and island climate significantly increase costs. Any economies of scope and scale that are available to a mid-size carrier like PRTC are necessarily diminished when facing these

cost-increasing factors that carriers serving urban areas do not encounter.

For these reasons, PRTC urges the Commission to reconsider in part its Universal Service Order to find that carriers serving insular areas should also be permitted to transition to the proxy cost model methodology.

Respectfully submitted,



Joe D. Edge
Tina M. Pidgeon
DRINKER BIDDLE & REATH LLP
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005
(202) 842-8800

Dated: July 17, 1997

CERTIFICATE OF SERVICE

I, Dottie E. Holman, do hereby certify that a copy of the foregoing Comments was sent by first class United States mail, postage prepaid, this 17th day of July, 1997, to the following:

William F. Caton*
Secretary
Federal Communications
Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Sheryl Todd*
Common Carrier Bureau
Federal Communications
Commission
2100 M Street, NW, Room 8611
Washington, DC 20554

ITS*
1231 20th Street, NW
Room 102
Washington, DC 20037

The Honorable Reed E. Hundt*
Chairman
Federal Communications
Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Honorable Rachelle B. Chong*
Commissioner
Federal Communications
Commission
1919 M Street, NW, Room 844
Washington, DC 20554

The Honorable Susan Ness*
Commissioner
Federal Communications
Commission
1919 M Street, NW, Room 832
Washington, DC 20554

The Honorable Julia Johnson
Commissioner
Florida Public Service
Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable David N. Baker
Commissioner
Missouri Public Service
Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

The Honorable Sharon L. Nelson
Chairman
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Hon. Laska Schoenfelder
Commissioner
South Dakota Public Utilities
Commission
State Capitol
500 E. Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Public Counsel for the State
of Missouri
P.O. Box 7800
Jefferson City, MO 65102

Paul E. Pederson
State Staff Chair
Missouri Public Service
Commission
P.O. Box 360
Jefferson City, MO 65102

Lisa Boehley*
Federal Communications
Commission
2100 M Street, NW, Room 8605
Washington, DC 20554

Charles Bolle
South Dakota Public Utilities
Commission
State Capitol
500 E. Capitol Street
Pierre, SD 57501-5070

Deonne Bruning
Nebraska Public Service
Commission
300 The Atrium
1200 N Street, P.O. Box 94927
Lincoln, NE 68509-4927

James Casserly*
Federal Communications
Commission
Office of Commissioner Ness
1919 M Street, Room 832
Washington, DC 20554

John Clark*
Federal Communications
Commission
2100 M Street, NW, Room 8619
Washington, DC 20554

Bryan Clopton*
Federal Communications
Commission
2100 M Street, NW, Room 8615
Washington, DC 20554

Irene Flannery*
Federal Communications
Commission
2100 M Street, NW, Room 8922
Washington, DC 20554

Daniel Gonzalez*
Federal Communications
Commission
Office of Commissioner Chong
1919 M Street, NW, Room 844
Washington, DC 20554

Emily Hoffnar*
Federal Communications
Commission
2100 M Street, NW, Room 8623
Washington, DC 20554

L. Charles Keller*
Federal Communications
Commission
2100 M Street, NW, Room 8918
Washington, DC 20554

Lori Kenyon
Alaska Public Utilities
Commission
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501

David Krech*
Federal Communications
Commission
2025 M Street, NW, Room 7130
Washington, DC 20554

Debra M. Kriete
Pennsylvania Public Utilities
Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Diana Law*
Federal Communications
Commission
2100 M Street, NW, Room 8920
Washington, DC 20554

Mark Long
Florida Public Service
Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399

Robert Loube*
Federal Communications
Commission
2100 M Street, NW, Room 8914
Washington, DC 20554

Samuel Loudenslager
Arkansas Public Service
Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of
Consumer Advocate
PA Public Utility
Commission
1425 Strawberry Square
Harrisburg, PA 17120

Michael A. McRae
D.C. Office of the People's
Counsel
1133 15th Street, NW
Suite 500
Washington, DC 20005

Tejal Mehta*
Federal Communications
Commission
2100 M Street, NW, Room 8625
Washington, DC 20554

Terry Monroe
New York Public Service
Commission
3 Empire Plaza
Albany, NY 12223

John Morabito*
Deputy Division Chief,
Accounting and Audits
Federal Communications
Commission
2000 L Street, NW, Room 812
Washington, DC 20554

Mark Nadel*
Federal Communications
Commission
2100 M Street, NW, Room 8916
Washington, DC 20554

John Nakahata*
Federal Communications
Commission
Office of the Chairman
1919 M Street, NW, Room 814
Washington, DC 20554

Lee Palagyi
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504

Kimberly Parker*
Federal Communications
Commission
2100 M Street, NW, Room 8609
Washington, DC 20554

Barry Payne
Indiana Office of the Consumer
Counsel
100 North Senate Avenue
Room N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri*
Federal Communications
Commission
2100 M Street, NW, Room 8924
Washington, DC 20554

James Bradford Ramsay
National Association of
Regulatory Utility
Commissioners
P.O. Box 684
Washington, DC 20044-0684

Brian Roberts
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel*
Federal Communications
Commission
2000 L Street, NW, Room 812
Washington, DC 20554

Richard Smith*
Federal Communications
Commission
2100 M Street, NW, Room 8605
Washington, DC 20554

Pamela Szymczak*
Federal Communications
Commission
2100 M Street, NW, Room 8912
Washington, DC 20554

Lori Wright*
Federal Communications
Commission
2100 M Street, NW, Room 8603
Washington, DC 20554



Dottie E. Holman

*via hand delivery